

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

UNITED STATES OF AMERICA

V.

JASON LEE HYLAND

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§
§

Criminal No. 4:21-MJ-91

UN-OBJECTED TO MOTION TO MODIFY BOND CONDITIONS

TO THE HONORABLE KIMBERLY C. PRIEST JOHNSON,

COMES NOW the defendant, Jason Hyland, by and through his attorney of record, Reed Prospere, and files this unobjected to motion to modify bond release conditions and for cause would show:

I.

The Government prosecutor in charge of this case, Kimberly Paschall, with the U.S. Attorney's office in Washington, D.C., has been consulted and does not object to the requested modification of this condition.

II.

On February 2, 2021, this Defendant was released with one of his release conditions being "that he have no contact or communication with basically anyone, witness or person associated with this charge and this included a person also charged in this episode, Ms. Katherine Schwab.

III.

Mr. Hyland respectfully requests that his conditions of release allow him to be in contact and communicate with Ms. Schwab in as much as they were living with each other at the time of the

bond hearing and the government's case against each of them would not be negatively impacted by modifying this condition as requested.

WHEREFORE, PREMISES CONSIDERED, the Defendant requests that this unobjected to modification be granted.

Respectfully submitted,
PROSPERE & RUSSELL
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Dallas, Texas 75225
214/750-8555
214/750-8001 - Telecopier

By: /s/ Reed Prospere
Reed W. Prospere
State Bar Card No. 16351800

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF CONFERENCE

This is to certify that the undersigned attorney has communicated via e-mail (kimberly.paschall@usdoj.gov) with Ms. Kimberly Paschall, Assistant United States Attorney, regarding the filing of this Motion, of which he:

_____	agrees
<u>XX</u> _____	does not object
_____	could not be reached
_____	has no opinion

/s/ Reed Prosper
Reed W. Prosper

CERTIFICATE OF SERVICE

I hereby certify that true and correct copy of the foregoing has been e-filed to Kimberly Paschall, (kimberly.paschall@usdoj.gov), Assistant United States Attorney, on the 3rd day of February, 2021.

/s/ Reed Prosper
Reed W. Prosper